

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

KYLE HARVEY, NATURAL AND)	
BIOLOGICAL FATHER OF A.H., A MINOR,)	
DECEASED,,)	
)	
Plaintiff,)	
)	Cause No. 4:19-cv-00902
v.)	
)	Division No.
GREAT CIRCLE AND KELLY ANN)	
CONNELLY.)	
)	
)	
Defendants.)	

PLAINTIFF'S REQUEST FOR ORAL ARGUMENT

COMES NOW Plaintiff, Kyle Harvey, Natural and Biological Father of A.H., a Minor, Deceased,, by and through attorney E. Ryan Bradley of The Bradley Law Firm and for his Request for Oral Arguments states as follows to this Court:

1. Plaintiff requests oral argument on his Motion for Joinder and to File an Amended Complaint [Doc. 107] filed on January 28, 2021 pursuant to Local Rule 4.02.

2. The reason why oral argument is necessary is to address Defendants' incorrect and flawed legal position(s) and explain why amendment and joinder are warranted by the applicable Federal Rules of Civil Procedure and why granting of Defendants' motion would deprive Plaintiff of due process on important civil rights claims involving the tragic death of his minor daughter.

3. Plaintiff will be severely prejudiced if he cannot proceed with his causes of action against these defendants as well as Missouri Alliance and Emily Rinehart and have those causes of action disposed of *on the merits*.

4. In accordance with this Court's Order dated September 4, 2020 [Doc. #95], all counsel is available for a hearing on March 17 or 24 in the afternoon or April 2 or 5 in the afternoon. Plaintiff is available at any time on any date for a hearing should those four dates provided by defense counsel not suit the Court's schedule. Furthermore, it is Plaintiff's position that the April dates are unnecessarily protracted and would cause needless delay in the prosecution of this case.

WHEREFORE, Plaintiff prays for this Court to SUSTAIN Plaintiff's request for oral argument on this motion and set the same for argument on March 17 or alternatively March 24 in the afternoon and for any such other further relief as this Court deems appropriate.

Respectfully submitted,

/s/ E. Ryan Bradley

By: _____

E. Ryan Bradley, #53777
The Bradley Law Firm
Attorney for Plaintiff
1424 Washington Avenue, Ste 300
St. Louis, MO 63103
(314) 721-9111 (phone)
(314) 255-2765 (fax)
Ryan@thebradleylawfirm.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on Thursday, March 12, 2021, I electronically filed the foregoing Certificate of Service with the Clerk of the Court using the **Missouri Courts E-Filing System** which was sent notification of such filing to all counsel of record. I further certify that I signed, or caused my electronic signature to be placed upon the original of the foregoing

documents and that a copy of the foregoing was sent via the Court's efilings system to.

Casey F. Wong
Sandberg, Phoenix & von Gontard
Attorney For: Great Circle
600 Washington Ave - 15th Floor
St. Louis, MO 63101
Phone: (314) 231-3332
Fax: (314) 241-7604
Email Address: cwong@sandbergphoenix.com

Philip C. Graham
Sandberg Phoenix & von Gontard
Attorney For: Great Circle
600 Washington Ave - 15th Floor
St. Louis, MO 63101
Phone: (314) 231-3332
Fax: (314) 241-7604
Email Address: pgraham@sandbergphoenix.com

Stephen M. Strum
Sandberg Phoenix & von Gontard
Attorney For: Great Circle
600 Washington Ave - 15th Floor
St. Louis, MO 63101
Phone: (314) 231-3332
Fax: (314) 241-7604
Email Address: sstrum@sandbergphoenix.com

/s/E. Ryan Bradley